

**REMARKS**

Claims 21-26 are all the claims pending in the application, claims 17-20 having been replaced by new claims 21-26. Reconsideration of the application and allowance of all claims are respectfully requested.

Claim 17 is replaced with a new claim 21 directed to a method for automatically recognizing a destination address of a postal item. Optimization of the degree of unambiguous resolution is the aim of the invention as recited in page 2 line 25 of the specification.

Claim 18 is replaced with a new claim 22 which is in independent form and in which the steps for computing a cost value are defined in detail, the claimed subject matter being supported by the specification at page 9.

New claim 23 is an independent claim directed to a system for carrying out the method of claim 21.

New claim 24 is an independent claim directed to a system for carrying out the method of claim 22.

New claim 25 is directed to a sorting machine having an address recognition system according to claim 23.

New claim 26 is directed to a sorting machine having an address recognition system according to claim 24.

It is believed that all claims overcome the non-art rejections and objections stated with respect to claims 17-20 in paragraphs 3, 4 and 9-11 of the Office action.

The rejections stated in paragraphs 6-8 are respectfully traversed, and are further obviated by the amended claims. A common thread in all of the Section 112 rejections of the examiner is that a claim cannot properly recite conditional steps. It is submitted that this is incorrect. The claims are not properly interpreted as not requiring that the conditional event ever occur. But in any event the claims are amended to preclude this interpretation and to now recite the conditional step as happening when the condition occurs, not if.

Turning now to the prior art rejections, claims 17 and 19 are rejected for anticipation by Ross et al, and claims 18 and 20 are rejected as unpatentable over Ross et al in view of Welsh. These rejections are traversed to the extent they apply to claims 21-26.

First, it is apparent that the rejections are only supported by the examiner ignoring all of the conditional language in the claims as stated in the Examiner's Note at page 6 of the Office action. New claims 21-26 are not subject to this interpretation by the examiner.

Further, Ross does not teach the optimization steps recited in the present claims, nor has the examiner asserted that it does. The examiner relies on Welsh to teach computation of cumulated extra cost values, and forwarding the mail item towards a sorting output in accordance with the cumulated extra costs value. But Neither Ross nor Welsh teach the optimization steps of the claimed invention.

The optimization method of claims 21 and 22 reduces the rejection rate of an automatic postal address recognition process by accepting a certain level of classification error as recited in the specification in page 3 lines 14-18. Welsh discloses a cost minimizing mail arbitrator which selects an optimum delivery point (Zip Code) among a plurality of delivery points provided from a plurality of parallel directory search match modules (DMM). In Welsh, it is suggested in column 8, lines 50-56 that "the cost for incorrectly delivering to each hierarchical level varies because the further into the hierarchy that error occurs, the lower the costs of correcting the error. For example, delivering to the wrong house, within the correct zone, is a less costly error than delivering to the wrong zone".

In Welsh, the arbitrator has a cost tuner and an arbitration controller. The cost tuner determines an average weighted cost (AWC) for each DMM. Each AWC is sorted in a cost profile based upon the level of sort for the Zip Code result provided by the DMM. The AWC is calculated (see column 14, lines 7 to 15) from the relation below :

$$\text{AWC} = (\text{rate of correct delivery} * \text{cost to correctly deliver}) + (\text{rate of} \\ \text{incorrect delivery} * \text{cost to incorrectly deliver})$$

The AWC is stored in a cost profile array 18 by indexing to quality, LOS code, DMM and length of Zip Code. Therefore, the cost approach disclosed in Welsh is based on a cost computation which is inherent to each resolution result.

The cost approach according to the invention is different from Welsh in that it is based on a relative cost computation between several resolution results. In particular, Welsh does not disclosed a step of detecting that resolution results provided by two DMM are corresponding to the same delivery round as required in claim 21 and/or to two delivery offices as required in steps c) and d) of claim 22. Furthermore, Welsh does not at all disclose the use of ambiguous resolution results for carrying out the arbitration, but only unambiguous results provided by the plurality of DMM as these DMM may use different resolution algorithms (see column 1, lines 56 to 60).

For the above reasons, it is submitted that the subject matter of claims 21-26 is neither shown nor suggested by the art of record.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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WASHINGTON OFFICE

**23373**

CUSTOMER NUMBER

Date: March 29, 2010

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